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March 3, 2005

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: CC Docket No. 98-67 and GC Docket No. 03-123 [Reply Comments]

To Whom It May Concern:

The FCC has requested comments on the speed of answer requirement for Video Relay Service (VRS) providers. As the Director of Gallaudet Interpreting Service at Gallaudet University for 11 years, and the founder of the Gallaudet VRS center, I believe that I am particularly qualified to comment.

The most significant issue with regard to VRS services is that there is a critical shortage of qualified interpreters. As noted by the Registry of Interpreters for the Deaf (RID) there is a "crisis in the quantity, quality, and qualifications of interpreters...a national shortage of interpreters exists."¹ RID also has noted that there was an "ever-widening shortage"² of qualified interpreters nationwide prior to the provision of VRS. The popularity of this service has brought the shortage of interpreters beyond the critical point. VRS continues to grow at an ever increasing rate (from 381,783 minutes in December 2003 to 1,424,155 minutes in December 2004).³ Interpreter training programs, which have grown from approximately 25 programs ten years ago to over 150 at present,⁴ are struggling to keep up with the training and language development to meet this increasing demand. As noted by Ms. Cordano at the University of Minnesota, "it takes several years to develop interpreters to achieve certification after they have graduated from Interpreter Training Programs." She further noted that VRS, "...offers opportunities for access that achieve remarkably effective communication, as long as the interpreters working in the relay FCC

¹ See Registry of Interpreters for the Deaf Comments, CC Docket No. 98-67, filed February 25, 2005, page 1.

² See Registry of Interpreters for the Deaf Comments, CC Docket No. 98-67, filed February 14, 2005, page 3.

³ See TRS Fund Performance Status Report, Status as of February 10, 2004 and Status as of January 31, 2005. Retrieved from NECA.org on March 2, 2005.

⁴ See Registry of Interpreters for the Deaf Comments, CC Docket No. 98-67, filed February 14, 2005, page 2.



operations are certified and experienced.”⁵ GIS’s experience with finding qualified interpreters for its VRS center is instructive.

Before hire, all GIS interpreters go through a screening process to determine whether they possess the communication skills necessary to work on campus and in GIS’s VRS call center. Fewer than half of those screened are determined to be qualified. GIS recruits interpreters from throughout the United States, but the pool of skilled interpreters available currently is insufficient to meet GIS’s demand. The single limitation on the growth of GIS’s VRS is the lack of sufficiently well-trained interpreters to meet GIS’s standards and the expectation for quality interpreting by the Deaf community.

GIS has taken the position that its first obligation is quality of interpretation and that wait time is less important if quality of interpreting can not be maintained. If the Commission were to eliminate the speed of answer waiver, the overall quality of service currently seen in VRS would be severely compromised. The Commission would in effect be encouraging VRS providers with high demand, like GIS, to lower their standards. As noted in Sorenson Media’s comments of February 25, 2005, deaf consumers can choose to use other providers of VRS if speed of answer is of primary concern.⁶

GIS also believes that the elimination of the speed of answer waiver would compromise the health and well-being of the interpreters currently working in VRS. If speed of answer rules were implemented, increased pressure to answer calls within a specified period of time would translate into the reduction of needed breaks for interpreters within call centers in order to keep pace with the incoming calls. This scenario would compromise quality of interpreting service to consumers, increase the possibility of repetitive motion injuries, and decrease job satisfaction, further reducing the pool of qualified interpreters. If the Commission were to establish a speed of answer requirement, GIS believes that the ironic likely result would be reduced service to the Deaf community, in the form of reduced coverage of VRS hours.⁷

If the current speed of answer waiver is allowed to continue, however, in time the supply of qualified interpreters should catch up with demand in our free market economy. Gallaudet University, for example, will begin a new B.A. program in interpreting in the Fall of 2005. The students in this program will be exposed to numerous tracks of interpreting (educational, VRS, medical, legal, etc.) so that they can be better prepared

⁵ See University of Minnesota Comments CC Docket No. 98-97 and CG Docket No. 03-123, filed on February 25, 2005.

⁶ See Sorenson Media, Inc. Comments, CC Docket No. 98-67 and CG Docket No. 03-123, filed February 25, 2005.

⁷ See MCI Comments on VRS Speed of Answer, CG Docket No. 03-123, filed on February 25, 2005.

FCC Comments

03/03/05

Page 3

upon graduation to attain certification and have the skills necessary to provide quality interpreting service. Catonsville Community College, in nearby suburban Maryland, has an interpreting training program and places students with GIS to be mentored. GIS itself operates a Visiting Interpreter Program that brings in pre-certified interpreters, typically from out of state, to develop their skills via mentorship and on-site training, so that they can progress to certification and success. These programs will increase the pool of qualified interpreters available in the future.

Finally, it is a reasonable assumption that the popularity of GIS's VRS, which partners with Sorenson Media, is due to the quality of the technology and the interpreting provided. Deaf callers themselves have decided that quality of service is more valuable than speed of answer. Deaf individuals, like all individuals, should have choices available and should be given the freedom to choose what service best meets their needs. Eliminating the free choice of a Deaf person to choose quality over quantity is patronizing and inappropriate.

For the reasons indicated above, the Commission should extend the waiver currently in place and again review its feasibility once the shortage of qualified interpreters has been alleviated.

Sincerely,

A handwritten signature in blue ink that reads "Deborah E Van Cleve". The signature is fluid and cursive, with the first name "Deborah" and last name "Van Cleve" clearly legible.

Deborah E. Van Cleve
Director, Gallaudet Interpreting Service
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